

DAVID T. MALOOF (DM 3350)
THOMAS M. EAGAN (TE 1713)
MALOOF BROWNE & EAGAN LLC
411 Theodore Fremd Avenue - Suite 190
Rye, New York 10580
(914) 921-1200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Complaint :
 :
of : **08 Civ.3714 (LAK)**
 :
Salt Route, Ltd., as Owner of the M/V : **DECLARATION OF**
JOANNE I, For Exoneration from or : **THOMAS M. EAGAN**
Limitation of Liability :
 :
----- X

1. I am a partner of Maloof Browne and Eagan, LLC, attorneys of record for Claimants Abonos Colombianos S.A. and Industria Nacional de Gaseosas S.A. ("the Claimants).

2. Claimants desire that Maloof Browne & Eagan LLC withdraw as counsel of record and substitute Mr. Manuel Llorca of the firm of LLORCA & HAHN, LLP as their attorney. A copy of the Stipulation of Substitution is attached as Exhibit A. The file has been sent to Mr. Llorca.

3. This Limitation Action is in its initial stages. The only deadline set was for filing of claims (June 10, 2008), and Claimants timely filed their claims and answers.

4. No delay or prejudice will result from the substitution.

Wherefore, Claimants respectfully request that an Order be entered directing the substitution of LLORCA & HAHN, LLP as attorney of record in place of Maloof Browne and Eagan LLC.

I declare the foregoing is true under the penalty of perjury.

Dated: Rye, New York
July 9, 2008



THOMAS M. EAGAN

DAVID T. MALOOF (DM 3350)
 THOMAS M. EAGAN (TE 1713)
 MALOOF BROWNE & EAGAN LLC
 411 Theodore Fremd Avenue - Suite 190
 Rye, New York 10580
 (914) 921-1200

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

----- x
 In the Matter of the Complaint :

08 Civ.3714 (LAK)

Of :

: STIPULATION

Salt Route, Ltd., as Owner of the M/V
 JOANNE I, For Exoneration from or
 Limitation of Liability :

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 It is stipulated by and between Claimants Abonos Colombianos S.A. and
 Industria Nacional de Gaseosas S.A., and Maloof Browne & Eagan LLC, attorney of
 record for the Claimants, and Llorca & Hahn LLP, incoming attorneys for Claimants, that
 Llorca & Hahn LLP be substituted as the attorney of record for Claimants Abonos
 Colombianos S.A. and Industria Nacional de Gaseosas S.A., in the above-entitled action
 in place of Maloof Browne & Eagan LLC.

Dated: New York, New York, July 8, 2008

<p>LLORCA & HAHN LLP</p> <p>By: <u>Manuel R. Llorca</u> Manuel R. Llorca (ML 4034) 8 Watering Lane Norwalk, CT 06850 Office Phone. 203-642-7321 Office Fax. 203-642-7322 Email: m.llerca@llorcahahn.com <i>On behalf of Claimants Abonos Colombianos S.A. and Industria Nacional de Gaseosas S.A.,</i></p>	<p>MALOOF BROWNE & EAGAN LLC</p> <p>By: <u>Thomas M. Eagan</u> David T. Maloof (DM 3350) Thomas M. Eagan (TE 1713) 411 Theodore Fremd Avenue - Suite 190 Rye, New York 10580 Tel: (914) 921-1200 Fax: (914) 921-1023 Email: dmaloof@maloofandbrowne.com teagan@maloofandbrowne.com <i>Outgoing Attorneys</i></p>
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EXHIBIT A

DAVID T. MALOOF (DM 3350)
THOMAS M. EAGAN (TE 1713)
MALOOF BROWNE & EAGAN LLC
411 Theodore Fremd Avenue - Suite 190
Rye, New York 10580
(914) 921-1200

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In the Matter of the Complaint :
 : **08 Civ.3714 (LAK)**
of :
 :
Salt Route, Ltd., as Owner of the M/V : **AFFIDAVIT OF SERVICE**
JOANNE I, For Exoneration from or :
Limitation of Liability :
----- X

I, Thomas M. Eagan, being duly sworn, depose and say:

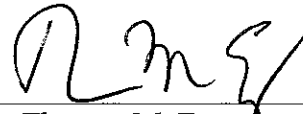
1. I am not a party to this action, and am over 18 years of age, and live in Maplewood, NJ.
2. On 9th day of July, 2008, I served the attached Notice of Motion and Declaration by email and mail upon the following:

Manuel R. Llorca
Llorca & Hahn, LLP
8 Watering Lane
Norwalk, CT 06850
Tel: (203) 642-7321
Fax: (203) 642-7322
m.llorca@llorcahahn.com

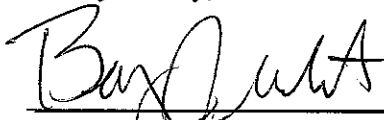
and by CM/ECF upon:

Caspar F. Ewig
Hill Rivkins & Hayden
45 Broadway
New York, NY 10006-3739
Tel: (212) 669-0616
Fax: (212) 669-0698

Dated: Rye, New York
July 9, 2008


Thomas M. Eagan

Sworn to before me this
9th day of July, 2008


Notary Public

BENJAMIN J. MOLLET
Notary Public, State of New York
No. 01MO6172574
Qualified in Westchester County
Commission Expires April 13, 2011